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April 11, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

SUBMITTED ELECTRONICALLY VIA ECFS

RE: COMMENTS FILED IN RESPONSE TO PUBLIC NOTICE DA 25-219 TO BE POSTED IN THE FOLLOWING DOCKETS:

- In Re: Delete, Delete, Delete, GN Docket No. 25-133
- In the Matter of Schools and Libraries Universal Service Support Mechanism, WC Docket No. 02-6
- Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184
- Promoting Fair and Open Competitive Bidding in the E-Rate Program, WC Docket No. 21-455
- In the Matter of Addressing the Homework Gap through the E-Rate Program, WC Docket No. 21-31

Dear Madam Secretary:

On behalf of the Los Angeles Unified School District (LAUSD) and our more than 500,000 students, we thank Chairman Brendan Carr for opening this comment period to address the efficacy of certain Commission rules. In filing these comments, we direct the Federal Communications Commission's (FCC) attention to comments previously submitted by LAUSD whereby we identify certain rules that could be modified to better enhance the efficiency and efficacy of the E-Rate program.

Modernize the Definition of Basic Firewalls

The FCC should acknowledge that current marketplace offerings and technological changes make the current definition of "basic firewall" under the E-Rate Eligible Services List outdated. The Commission should expand E-Rate eligibility to include those features necessary to protect schools' networks from modern-era cyberattacks.[1] The Commission should also explore raising the Category Two budget cap by a reasonable amount to accommodate current market pricing of such services.[2]

Eliminate Unfair Discount Discrepancy for Category Two Services

There is currently no difference between the Category One and Category Two discounts for entities qualifying for 80% discounts or less. However, at the 90% Category One discount band, the Commission inexplicably

[1] Letter from Martha Alvarez, relating to Ex Parte meeting with Greg Watson, WC Docket 13-184 (November 1, 2022).
[2] Letter from Superintendent Alberto M. Carvalho, WC Docket 13-184 (February 9, 2023).

lowered the Category Two discount rate to 85%. This difference is diametrically unfair to the most impoverished schools qualifying for the 90% Category One discount, and the Commission should remedy this inequity by raising the Category Two discount rate to 90%.

Evaluate Funding Category Two to Program Cap by Adjusting Available Funding Allocations
The annual E-Rate program cap has far exceeded demand for the past 10 years. However, this demand has been artificially lowered due to the Category Two "budget" allocation limitations. While it is laudable that the Commission created these budget allocations to ensure all entities have a fair chance of receiving Category Two funding, there continues to be a need for more funds to support Category Two on-campus infrastructure. We ask that the Commission examine how the program can effectively be updated to meet these unmet needs by allowing for either a raise in the Category Two budget allocations, or to allow for applicants to apply for funds in excess of their allocations when there is available funding under the cap.

Streamline Competitive Bidding Rules
The Commission should examine if there is any need for E-Rate program competitive bidding requirements when applicants must already adhere to state and local requirements. For years, a large number of appeals filed with the Commission end up being approved due to technicalities, misunderstandings, or conflicts with local rules. The program's complex bidding rules are onerous for the Commission, the program administrator, applicants, and service providers alike. As mentioned in our previous comments, the Commission should abandon the proposed bidding portal which would only further complicate bidding rules that are already fairly complex.[3]

Eliminate Ten-Year Documentation Retention Rules and Establish a Reasonable Funding Recovery Timeframe
The Commission's minimum ten-year documentation retention period is excessive and burdensome to program participants, and it deviates substantially from other federal programs as well as state and local requirements.[4] The Commission should align its requirements with other federal programs impacting public schools or defer to state and/or local requirements. The Commission's open-ended timeframe for audits and fund recovery should also be modified to align with any proposed documentation retention period.

If you have any questions, concerns, or ideas for strengthening our partnership, please contact Martha Alvarez, Chief of Legislative Affairs and Governmental Relations, at martha.alvarez1@lausd.net.

Sincerely,

Alberto M. Carvalho
Superintendent

c: Martha Alvarez

[3] Letter from Deputy Superintendent Megan K. Reilly, WC Docket 21-455 (March 23, 2022).

[4] For example, the retention period for the National School Lunch Program and Title I Program is three years. For California school districts, non E-Rate records such as bidding documents, invoices, and payments are retained for four years.